## ORIGINAL



	0000010
1	Richard L. Sallquist (002677) Sallquist, Drummond & O'Connor, P.C.  RECEIVED
2	4500 G. I. danahara Daire
:	Suite 339 7807 NOV -9 P 3: 40
3	Tempe, Arizona 85282 (480) 839-5202
4	(480) 839-5202  AZ CORP GOVERNMENT
ا ۔	Attorneys for Keaton Development Company
5	BEFORE THE ARIZONA CORPORATION COMMISSION
6	
_	IN THE MATTER OF THE APPLICATION OF ) DOCKET NO. W-02169A-07-0098
7	KEATON DEVELOPMENT COMPANY FOR ) AN EXTENSION OF ITS CERTIFICATE OF ) COMPANY'S
8	CONVENIENCE AND NECESSITY FOR THE ) OBJECTIONS TO THE STAFF
	PROVISION OF WATER SERVICE IN ) REPORT
9	PORTIONS OF LA PAZ COUNTY, ARIZONA, )
10	
11	Keaton Development Company ("Keaton") hereby files its Objections to the Staff
11	Report issued November 2, 2007 in accordance with the Procedural Order dated October 4, 2007.
12	
13	1. In the Executive Summary and on Page 1 of the Staff Report it indicates that
	Sunshine Acres contains 37 lots. In fact, that subdivision has 107 lots as set forth in the
14	Application at Exhibits E, G, H, and I. This should not impact on the analysis or the decision, but
15	
16	the record should accurately reflect the size of the development.
10	2. At Page 3, and at Further Recommendation 1, the Staff Report recommends that the
17	
18	Company file a Curtailment Tariff. Staff had informally informed the Company of this
	requirement, and the Company responded by filing in this Docket on October 31, 2007, a
19	Curtailment Tariff in the Engineering Division's prescribed format. This Tariff should be approved
20	Cultuminent Turni in the Engineering 21,151on 5 presente to 121111111 11 11 11 11 11 11 11 11 11 11
21	in the context of this proceeding.
21	Arizona Corporation Commission
22	DOCKETED
23	NOV <b>09</b> 2007
	DOCKETED BY

53001.00000.196

1	3. At Page 4, Recommendation 3, the Staff Report calls for an ATC for Sunshine
2	Acres. That was provided in the original Application at Exhibit G. The Salome Heights ATC will
3	be provided as recommended.
4	4. Not as an Objection, but as a request for Staff to revise the Staff Report, on
5	November 9, 2007, the Company docketed the ADEQ Compliance Status Report dated November
6	8, 2007, showing "No Major Deficiencies". Therefore, the Staff should delete their primary
7	recommendation of "denial" of the Application, and adopt a recommendation to grant the full
8	CC&N, conditioned only on their Recommendations 1, 2, 3 as revised above, and 4, all in
9	accordance with the above Objections
10	Subject to the above Objections, the Company accepts the recommendations of the Staff
11	Report.
12	DATED this day of November, 2007.
13	SALLQUIST, DRUMMOND & O'CONNOR, P.C.
14	
15	By
16	4500 S. Lakeshore Drive, Suite 339 Tempe, Arizona 85282
17	Attorney for Keaton Development Company
18	Original and fifteen coming of the
19	Original and fifteen copies of the foregoing filed this 4 day
20	of November, 2007, with:
21	Docket Control Arizona Corporation Commission
22	1200 West Washington Phoenix, Arizona 85007

23

1	A copy of the foregoing filed/mailed this <u>of the day of November, 2007, to</u>
2	•
3	Hearing Division Arizona Corporation Commission
4	1200 W. Washington Phoenix, Arizona 85007
5	Utilities Division Arizona Corporation Commission
6	1200 West Washington Phoenix, Arizona 85007
7	
8	Legal Division Arizona Corporation Commission 1200 Wast Washington
9	Phoenix Arizona 85007
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	

23